

ORIGINAL

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

FILED IN CLERK'S OFFICE
U.S.D.C. Atlanta

OCT 05 2007

By **JAMES H. HATTEN, Clerk**
Deputy Clerk

BRIDGET N. OBANDE,

Plaintiff,

vs.

**PROVIDENTIAL FUNDING
ASSOCIATES, LP.,**

Defendant.

CIVIL ACTION FILE

NO.

1:07-CV-2459

COMPLAINT

JEC

COMES NOW BRIDGET N. OBANDE, Plaintiff, in propria persona and tenders Plaintiff's Complaint and shows the Honorable Court as follows:

I.

Plaintiff is a resident of the State of Georgia and by the filing of the above-styled cause of action is subject to the jurisdiction and venue of the Honorable Court.

II.

Defendant is a foreign corporation, located in the State of California and conducts business in the State of Georgia and is subject to the jurisdiction of the Honorable Court.

III.

Jurisdiction and venue are properly before the Honorable Court. Plaintiff advances subject matter jurisdiction under and pursuant to the laws of the State of Georgia, as to breach of contract, O.C.G.A. Section 13-1-1 et. seq., fraud under and pursuant to O.C.G.A. Section 51-1-1 et. seq., and wilful bad faith and all other statutes which entitle Plaintiff to the legal relief being sought.

IV.

Plaintiff advances the following claims against the Defendant, to wit:

1. Plaintiff was in and under contract pursuant to certain residential property which is located in the State of Georgia.
2. Plaintiff, due to certain financial hardship conditions, fell behind on the mortgage payments as to the property in question.
3. Plaintiff repeatedly telephonically and otherwise communicated with authorized agents for the Defendant to make the necessary arrangements to workout the Plaintiff's financial hardship as to the residential property in question.
4. Plaintiff having considerable equity in the residential property, in communications with the Defendant's agents, informed the same that Plaintiff would be and was in the process of obtaining a purchaser of the Plaintiff's residential property, so that Plaintiff could recoup the Plaintiff's equity in the same.
5. Defendant's agents, wilfully and fraudulently informed Plaintiff that they would be willing and would have no problem with the Plaintiff's plans to sell the Plaintiff's and that the Defendant would work with Plaintiff for the sale of the property to said third person or party so that Plaintiff would receive

Plaintiff's equity in the residential property versus losing the same by and through pending foreclosure proceedings which would take place if the Plaintiff did not have and obtain a purchaser of the Plaintiff's residential property.

6. Notwithstanding the oral agreements, as fraudulently made to Plaintiff the Defendant wilfully foreclosed against the same knowing that Plaintiff had a purchaser for the same, so as to fraudulently obtain the equity in the Plaintiff's residential property which the Defendant fraudulently intended to obtain and take while wilfully and fraudulently leading Plaintiff to believe that the Defendant would allow Plaintiff to sell the residential property and pay off the legal and lawful debt as owed to the Defendant by the Plaintiff.

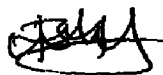
V.

Plaintiff demands a jury trial and the following legal relief, to wit:

- A. Actual Damages in excess of Fifty Thousand (\$50,000.00) Dollars, the exact amount to be determined prior to trial;
- B. Compensatory Damages in excess of Two Hundred Fifty Thousand (\$250,000.00) Dollars or such amount that the jury determines Plaintiff should receive for the humiliation and bad faith committed by the Defendant against the Plaintiff.
- C. Punitive Damages in excess of Two Hundred Fifty Thousand (\$250,000.00) Dollars or such amount that the jury determines Plaintiff should receive to ensure that the Defendant does not commit the same conduct against others similarly situated.

D. That the Honorable Court grant Plaintiff any other legal relief that the Honorable Court determines that Plaintiff is entitled to under law, equity or otherwise.

Respectfully submitted,



BRIDGET N. OBANDE
Plaintiff, In Propria Persona
2403 Montclair Park Lane
Marietta, GA 30068

Unsworn Verification of Complaint

I, **BRIDGET N. OBANDE**, under and pursuant to Title 28, U.S.C. Section 1746, do hereby state that the foregoing Complaint is true and correct under penalty of perjury.



BRIDGET N. OBANDE
Plaintiff, In Propria Persona